

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Court File No. CR-21-93 (JRT/TNL)

United States of America,
Plaintiff,

Motion for Discovery and Inspection

v.

Robbin Allen Thomas,
Defendant.

Pursuant to Fed. R. Evid. 16, Defendant Robbin Allen Thomas hereby moves the Court for an order compelling the Government to provide the defendant with:

1. Any and all written, recorded, or oral statements made by the defendant or copies thereof within the possession, custody or control of the government, the existence of which is known, or by the exercise of due diligence may become known to the attorney for the government.
2. The substance of any oral statement which the government intends to offer in evidence at the trial made by the defendant, whether before or after arrest.
3. A copy of the prior criminal record of the defendant which is known, or by the exercise of due diligence may become known to the attorney for the government.

4. Permission for the defendant to inspect and/or copy books, papers, documents, photographs, tangible objects which are within the possession, custody or control of the government and which are material to the preparation of the defense or are intended for use by the government as evidence in chief at the trial, or were obtained from or belonged to the defendant.
5. Permission to inspect and/or copy any results or reports of physical or mental examinations and of scientific tests or experiments or copies thereof which are within the possession, custody or control of the government.

Defendant further moves that this obligation be continuing, such that the government be required to notify defense counsel as to the existence of any additional evidence or material which is discovered subsequent to the initial disclosure.

This motion is based upon the files, records, and proceedings in this case and such additional arguments and authorities as may be submitted.

Respectfully submitted,

Dated: September 8, 2021

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